

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

LTL Management, LLC¹,

Debtor.

Case No. 23-12825

Chapter 11

Judge Michael B. Kaplan

INITIAL STATEMENT OF AD HOC COMMITTEE OF SUPPORTING TALC CLAIMANTS

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

The Ad Hoc Committee of Supporting Counsel (the “**Ad Hoc Committee**”), by and through its counsel, Paul Hastings LLP, Cole Schotz P.C. and Parkins & Rubio LLP, hereby submits this initial statement regarding its formation and membership.

1. As Mr. Watts advised the Court during the April 18, 2023 hearing, the Ad Hoc Committee has formed to advance the common interests of the law firms that have entered into a plan support agreement (each, a “**PSA**”) with the Debtor, Johnson & Johnson (“**J&J**”) and Johnson & Johnson Holdco (NA) Inc. (“**Holdco**”). The law firms on the Ad Hoc Committees contains preeminent members of the mass tort plaintiffs’ bar who have led the talc litigation for over a decade, including two former members of the Official Committee of Talc Claimants in the first bankruptcy brought by the Debtor. The Ad Hoc Committee’s clients include the vast majority of talc claims, and about 50% of those talc claimants with claims filed in federal and state courts. The expectation is that the Ad Hoc Committee’s membership will be expanded in the coming weeks to reflect the additional support for the Debtor’s proposed reorganization plan.

2. The Ad Hoc Committee is currently comprised of the following 14 law firms that are parties to a PSA, which collectively represent more than 55,000 talc claimants:

Andres Pereira Law Firm;

Nachawati Law Firm;

Ferrer Poirot & Wansbrough;

Johnson Law Group;

Liakos Law;

Linville Law Group;

McDonald Worley PC;

OnderLaw, LLC;

Pulaski Kherkher, PLLC;

Rueb Stoller Daniel (f/k/a Dalimonte Rueb, LLP);

Slater Slater Schulman LLP;

Trammell PC;

Watts Guerra LLP; and

Wisner Baum (f/k/a/ Baum, Hedlund, Aristei & Goldman, P.C.).

A summary of the number of talc claimants represented by each member of the Ad Hoc Committee is attached hereto as **Exhibit A**.

3. Notably, the Nachawati and Onder law firms represented members of the official committee of talc claimants in the Debtor's 2021 Chapter 11 case. *See In re LTL Management LLC*, No. 21-30589 (Bankr. D.N.J. Nov. 8, 2021) [D.I. 355] (appointing Kellie Brewer and Darlene Evans, represented by the Nachawati and Onder firms, respectively, to the 2021 TCC).² These two firms represent approximately 26,000 talc claimants in total.

4. Based on the Ad Hoc Committee members' discussions with certain law firms that support the settlement in principle, the Ad Hoc Committee expects that such firms will execute PSAs in the coming days and weeks. The Ad Hoc Committee believes that the talc claimants represented by such firms, together with the more than 55,000 claimants currently represented by members of the Ad Hoc Committee, hold a supermajority of talc claims against the Debtor that equals or exceeds the 75% threshold required under section 524(g) of the Bankruptcy Code.

5. The Ad Hoc Committee will file a statement as soon as reasonably practicable that includes the disclosures required by Bankruptcy Rule 2019. The Ad Hoc Committee will also promptly apprise the Court of any changes to its membership.

Dated: April 20, 2023

COLE SCHOTZ P.C.

/s/ Michael D. Sirota

Michael D. Sirota

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² *See also In re LTL Management LLC*, No. 21-30589 (Bankr. D.N.J. Jan. 20, 2022) [D.I. 1212] (reinstating the original TCC).

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